

Chapter 1

School-Determined Requirements

In this chapter, we discuss student eligibility requirements that don't require information from the Department's systems. The school determines on its own whether the student meets these eligibility requirements. In some cases, the financial aid office will need to get information from other school offices, such as the admissions office or the registrar, or from other organizations, such as high schools or testing agencies.

Regular Student in an Eligible Program

A person must be enrolled as a *regular student* in an eligible program to receive Federal Student Aid (FSA) funds (exceptions are discussed later in this chapter). A regular student is someone who is enrolled or accepted for enrollment in an eligible institution for the purpose of obtaining a degree or certificate offered by the school. The requirements for an eligible program are discussed in *Volume 2, Chapter 2*.

A school must document a student's enrollment in an eligible program at the time of admission, and it must have a system to notify the financial aid office if the student leaves the program. It must also document that an aid recipient is a regular student.

Conditional acceptance. Some schools admit students provisionally, for example, until they provide further documentation, such as academic transcripts or test scores, or demonstrate an ability to succeed in the program by receiving acceptable grades in program coursework. Typically, the school will limit these students' enrollment in terms of number of courses or enrollment status until they meet the necessary conditions.

Students admitted as conditional are regular students only if the school officially accepts them into the eligible degree or certificate program. The Department does not define official acceptance or admission. If the student is merely allowed to take some courses before being officially admitted to the program, she is not considered a regular student and is not eligible for Title IV funds until she is officially admitted.

Conditional acceptance examples

1. Waveland University allows students to take graduate courses before they have taken the GRE, but it limits them to no more than three courses and does not admit them into its graduate programs until they have submitted acceptable GRE scores. They aren't regular students, and because the school hasn't admitted them, they aren't eligible for Title IV funds.
2. When Wrigley University accepts students into its graduate programs, it requires that the students receive no grade lower than a "B" in the first three courses. During this time, the school considers students to be admitted into the program, so they are eligible for Title IV aid. If, however, students receive a grade lower than a B in any of the first three classes, their admittance will be withdrawn and they then will be ineligible for further Title IV funds.

Regular student example

Northside Community College (NSCC) allows anyone with a high school diploma or the equivalent to enroll in any course. Many of NSCC's students do not intend to receive a degree or certificate; they are not regular students. NSCC requires those who want to receive a degree or certificate to complete a form stating the degree or certificate for which they are studying and to meet periodically with an academic advisor. NSCC considers them to be regular students.

Regular students

Student eligibility

[34 CFR 668.32](#). See *Volume 2, Chapter 2* for eligible program requirements.

Schools may offer a trial or conditional period during which a student attends a program without incurring program charges or receiving Title IV funds. There are no restrictions as to program type (undergraduate vs. graduate level, program structure or academic level, etc.) for such students. If the student continues beyond the trial period and enrolls as a regular student, the school can pay him FSA grants for the entire payment period and loans for the period of enrollment. See [Dear Colleague Letter GEN-11-12](#) for more information.

Continuing education. Regular students may receive aid for classes they take in a school's continuing education department as long as the classes apply to their degree or certificate program.

Continuing education examples

Sheffield University has a continuing education department that offers many online courses that students enrolled in other programs at the school may take and that apply to the degree or certificate program in which the students are enrolled as regular students.

Windy City University has a continuing education department that offers many courses. Some students enroll in these courses without being admitted to the university. These students are not regular students and are not eligible for Title IV funds.

Remedial coursework

Remedial coursework prepares a student for study at the postsecondary level (as opposed to preparatory coursework, which prepares a student for a given program). A student enrolled solely in a remedial program is not considered to be in an eligible program. If acceptance into an eligible program is contingent on completing remedial work, a student cannot be considered enrolled in that program until she completes the remedial work.

However, if the student is admitted into an eligible program and takes remedial coursework within that program, they can be considered a regular student, even if he is taking all remedial courses before taking any regular courses. You may count up to one academic year's worth of these courses in his enrollment status for Title IV funds. For the purpose of this limit, that is 30 semester or trimester hours, 45 quarter hours, or 900 clock hours. If the remedial classes are non-credit or reduced-credit, you must determine how many credit hours they are worth to count toward the student's enrollment status (see "Enrollment status" section in this chapter).

A remedial course cannot be below the educational level needed for a student to successfully pursue their program after one year in that course. Also, remedial courses must be at least at the high school level, as determined by the institution (i.e. your school), its state legal authority and its accrediting agency, or state agency recognized for approving public postsecondary vocational education. If any of those parties determine that a remedial class is below the secondary level, the school must abide by that determination, and the class cannot be included for FSA purposes. Additionally, Title IV funds cannot be used for any remedial course that uses direct assessment of student learning instead of credit or clock hours.

You cannot use non-credit remedial hours to determine a student's enrollment status if the course is part of a program

that leads to a high school diploma or its recognized equivalent. A student is never permitted to receive funds for training or for coursework prior to the completion of high school, even if the high school equivalency training is offered at postsecondary schools or is required for the postsecondary program.

Similar to other remedial coursework, a student may receive Title IV funds for English as a second language (ESL) courses that are part of a larger eligible program. There are differences though: ESL courses don't count against the one-year limitation on remedial coursework, and they need not be at the secondary school level.

If your school permits a student to enroll in ESL or other remedial courses that don't apply to his degree or certificate, be aware that awarding FSA loans or Pell Grants over a series of semesters for such work can exhaust his eligibility for Pell Grants and/or FSA loans before he completes his program.

Remedial coursework

[34 CFR 668.20](#)

Preparatory coursework

A student not enrolled in a degree or certificate program is eligible for Direct Subsidized/Unsubsidized Loans (and a parent may receive Direct PLUS Loans on behalf of a dependent student) for up to one year if she is taking coursework necessary for enrollment in an eligible program. See the discussion under Direct Loans in *Chapter 6* of this volume.

Teacher certification coursework

A student may receive Federal Work-Study (FWS), as well as Direct Subsidized/Unsubsidized Loans (and a parent may receive Direct PLUS Loans on behalf of a dependent student) if he or she is enrolled at least half time in required teacher certification coursework, even if it does not lead to a degree or certificate awarded by the school. For more details on Direct Loan eligibility criteria, see *Chapter 6* of this volume.

To qualify, the coursework must be required for elementary or secondary teacher certification or recertification in the state where the student plans to teach and must be offered in credit or clock hours. Courses using direct assessment in lieu of credit or clock hours are not eligible. An otherwise eligible student may also receive a TEACH Grant. Optional courses that the student elects to take for professional recognition or advancement, and courses recommended by your school but not required for certification, do not qualify. You should document that the courses are required by the state for teacher certification.

A student with a bachelor's degree who is enrolled in a post baccalaureate teacher certification program can receive a Pell Grant in limited situations. See *Chapter 6* of this volume.

Teacher certification coursework

[34 CFR 668.32\(a\)\(1\)\(iii\)](#)

[DCL GEN-16-10](#)

HEA Sec. 484(b)(4)

HEA Sec. 401(c)(4)(B)

Graduate or professional student definition

For Title IV student eligibility purposes, a graduate or professional student is defined as a student who is enrolled in a program or course above the baccalaureate level or in a professional program and has completed the equivalent of three academic years of full-time study, either prior to entering the program or as part of the program itself. Also, a student who is receiving Title IV aid as an undergraduate student cannot be considered a graduate/professional student for that same period of enrollment.

A student in a graduate program who does not meet the regulatory definition of a graduate student (see below) can't get any Title IV aid until they meet the regulatory definition of a graduate student, unless they are enrolled in a dual degree/combo program in which they will receive a bachelor's degree, for which they can receive undergraduate aid until they complete the undergraduate portion of the program.

For programs which only lead to a graduate or professional degree, but admit students who do not yet meet the regulatory requirements to be considered graduate/professional degree students, students enrolled in such programs who do not yet qualify as a graduate/professional student are not considered enrolled in an undergraduate program of study, and therefore are ineligible to receive any Title IV aid until they have completed at least three years of full-time study. Once this type of student has completed at least three years of full-time study, they are eligible to receive graduate-level Title IV aid.

For more detail, see *Volume 3, Chapter 5* of the *FSA Handbook*, and [34 CFR 668.2\(b\)](#).

Students with intellectual disabilities

Students with an intellectual disability (see definition below) can receive funds from the Pell Grant, FSEOG, and FWS programs. They must be enrolled or accepted for enrollment in a comprehensive transition and postsecondary program (as defined in [34 CFR 668.231](#)) for students with intellectual disabilities and must maintain satisfactory academic progress as determined by the school for this program. These students:

- do not have to be enrolled for the purpose of obtaining a degree or certificate, and
- are not required to have a high school diploma or its recognized equivalent.

Students who meet both of the following conditions may be considered students with intellectual disabilities for Title IV purposes:

- have a cognitive impairment characterized by significant limitations in intellectual and cognitive functioning and adaptive behavior as expressed in conceptual, social, and practical adaptive skills; and
- are currently or were formerly eligible for special education and related services under the Individuals with Disabilities Education Act (IDEA) (20 U.S.C. 1401), including students who were determined eligible for special education or related services under the IDEA but were homeschooled or attended private school. See [668.233\(c\)](#) for documentation requirements.

Except for the provisions governing need analysis, the Secretary has the authority to waive any Pell Grant, FSEOG, FWS, or institutional eligibility provisions necessary to ensure that programs enrolling students with intellectual disabilities are eligible for these three types of federal student aid and that eligible students receive those funds.

Students with intellectual disabilities

HEA Sec. 484(s), 34 CFR 668.230–233, 20 U.S.C. 1091, 1140

Elementary or Secondary Enrollment

A student enrolled in elementary or secondary school is not eligible for aid from the FSA programs, even if she is

simultaneously enrolled in an eligible college program. A student is considered to be enrolled in secondary school if she is pursuing a high school diploma or if she has completed the requirements for a diploma, has not yet received it, and either she is taking college coursework for which her high school gives credit or her high school still considers her to be enrolled there.

An adult pursuing a high school equivalency certificate (not a high school diploma) is not considered to be enrolled in secondary school. However, as stated earlier, a student cannot get aid for high school equivalency training. However, an adult can take a course offered by a high school, such as a driver’s education course, without being considered enrolled there.

Secondary school enrollment examples

Marie is a junior in high school and enrolls in an electronics technician program at Lakeshore Community College (she is above the age of compulsory school attendance for her state and therefore can be admitted as a regular student). The coursework is offered evenings and weekends, so she can still attend her high school classes. The electronics technician program is an eligible postsecondary program, and Marie will receive a certificate from Lakeshore when she completes the program. However, she is not eligible for aid because she is still enrolled in high school.

Elementary/secondary enrollment

HEA Sec. 484(a)(1), [34 CFR 668.32\(b\)](#)

Academic Qualifications

- To receive Title IV funds, a student must be qualified to study at the postsecondary level. A student qualifies if she:
- has a high school diploma (this can be from a foreign school if it is equivalent to a U.S. high school diploma);
 - has the recognized equivalent of a high school diploma, such as a general educational development (GED) certificate or other state sanctioned test or diploma-equivalency certificate;
 - has completed homeschooling at the secondary level as defined by state law;
 - has completed secondary school education in a homeschool setting which qualifies for an exemption from compulsory attendance requirements under state law, if state law does not require a homeschooled student to receive a credential for their education; or
 - has completed one of the ability-to-benefit (ATB) alternatives and is either currently enrolled in an eligible career pathway program or first enrolled in an eligible postsecondary program prior to July 1, 2012.

A student may self-certify on the FAFSA that he has received a high school diploma or high school equivalency certificate or that she has completed secondary school through homeschooling as defined by state law. If a student indicates that he has a diploma or high school equivalency certificate, your school isn’t required to ask for a copy (except as noted below), but if your school requires a diploma for admission, then you must rely on that copy of the diploma or high school equivalency certificate and not on the student’s certification alone.

Awards submitted to the Common Origination and Disbursement (COD) system for all students require a Student Eligibility Code (previously Ability to Benefit Code) to report how the student (including graduate and professional students) is qualified to study at the postsecondary level (e.g. by obtaining a high school diploma or its recognized equivalent). For more detail on submitting the appropriate Student Eligibility Code, see the COD Technical Reference on FSA Partner Connect.

Academic qualifications

Checking the validity of a high school diploma

If your school or the Department has reason to believe that the high school diploma is not valid or was not obtained from an entity that provides secondary school education, you must evaluate the validity of the student's high school completion. In order to satisfy the requirements of the regulation on this issue ([34 CFR 668.16\(p\)](#)), your school may:

1. check with the high school to confirm the validity of the student's diploma; and
2. confirm with the relevant department or agency in the state in which the secondary school is located that the secondary school is recognized as a provider of secondary school education.

The above two-part description satisfies the high school validity requirement. Other approaches used by schools are also valid if they comply with the language of [34 CFR 668.16\(p\)](#). Students who indicate on their FAFSA that they graduated high school must give the name, city, and state of the high school. FAFSA on the Web will not allow students to skip these items, and it will have a drop-down list of both public and private high schools populated by the National Center for Education Statistics (NCES). Inclusion on the list does not mean that a diploma from the school is valid, nor does exclusion from the list mean that the diploma is invalid. Acceptable documentation for checking the validity of a student's high school completion can include the diploma and a final transcript that shows all the courses the student took.

Diplomas from unaccredited high schools can be valid and qualify students to receive Title IV funds, as well as to meet college admission standards. One resource that a school may consider using to determine if a high school diploma is valid is the department of education of the state in which the high school is located, if that agency has jurisdiction over the high school. Colleges are also free to consult with each other as they develop their procedures for checking the validity of high school diplomas. For students who completed their secondary schooling outside the United States, comparable documents can help, as can the services of companies that determine the validity of foreign secondary school credentials.

A student's self-certification is not sufficient to validate a high school diploma that is in question. If there is conflicting information between the student's certification on the FAFSA and other documentation or information obtained from the student, the institution must resolve this conflict. For an institution to be a Title IV eligible institution, it must admit as regular students only those with a high school diploma or the recognized equivalent and/or those who are beyond the age of compulsory school attendance in the State where the institution is located. As in other areas of FSA administration, schools have final authority in meeting this requirement. The Department does not plan to have an appeal process or to intervene in reasonable judgments of school administrators, such as a decision to move a high school from a college's acceptable to unacceptable list or a case where one school has different lists than another.

Checking the validity of high school completion

E-Announcement July 23, 2019, [34 CFR 668.16\(p\)](#)

Foreign high school diplomas

High school diplomas/transcripts from other countries are acceptable toward the student eligibility general requirement, as long as the diploma is equivalent to a U.S. high school diploma.

A school that is qualified to evaluate the credential may do so. A school that is not qualified or chooses not to evaluate the credential can instead require students to have their credential evaluated by a company that offers such a service. The school may pay for the evaluation, but if it does so, it can only have students reimburse it for the cost if it requires the evaluation as part of its admission process for all students who have a foreign credential.

You may not require only students who are applying for federal student aid to pay the school to have their credential evaluated because that would amount to the school charging a fee to complete the FAFSA, which is prohibited under HEA 483(a)(6). In such cases, because the cost of evaluating a foreign credential is incurred as a charge of admission prior to enrollment in an eligible program, it cannot be included in students' cost of attendance (COA).

You may accept self-certification that a student has completed a foreign high school (or equivalent) education if:

- The student is selected for verification tracking groups V4 or V5 (see the Application and Verification Guide for more information), in which the student must provide proof of high school completion; and
- It is impossible for a refugee, asylee, or victim of human trafficking to obtain documentation of his or her completion of a secondary school education in a foreign country.

In these cases, the applicant must:

- Present their entry status documentation that demonstrates their current or prior status as a refugee, asylee, or victim of human trafficking who entered the U.S. after the age of 15; AND
- Provide proof of their attempt to obtain documentation of their completion of a secondary school education in a foreign country, i.e. a copy of an e-mail or letter (including proof of mailing) (see item FHD-Q2/ A2 at www2.ed.gov/policy/highered/reg/hearulemaking/2009/hsdiploma.html).

Foreign diplomas

www2.ed.gov/policy/highered/reg/hearulemaking/2009/hsdiploma.html

Recognized equivalents of a high school diploma

The Department recognizes several equivalents to a high school diploma:

- A GED certificate;
- a certificate or other official completion documentation demonstrating that the student has passed a state-authorized examination (such as the Test Assessing Secondary Completion (TASC) the High School Equivalency Test (HiSET), or, in California, the California High School Proficiency Exam) that the state recognizes as the equivalent of a high school diploma (certificates of attendance and/or completion are not included in this qualifying category);
- an associate's degree;
- successful completion of at least 60 semester or trimester credit hours or 72 quarter credit hours that does not result in the awarding of an associate's degree, but that is acceptable for full credit toward a bachelor's degree at any institution; or
- enrollment in a bachelor's degree program where at least 60 semester or trimester credit hours or 72 quarter credit hours have been successfully completed, including credit hours transferred into the bachelor's degree program.
- for a student who enrolls without completing high school, a transcript indicating the student has excelled in high school. The student must no longer be enrolled in high school, must satisfy your school's written policy for admitting such students, and must be starting a program that leads at least to an associate's degree or its equivalent.

Note that merely possessing a certificate of attendance and/or high school completion is **not** sufficient for a student to be Title IV aid eligible. Such a certificate may be issued without a student having completed all of the academic graduation requirements, including passing any required examinations. A state must consider a certificate or high-school-completion-equivalency test as equivalent to a high school diploma in that state in order for it to be considered equivalent to a high school diploma for Title IV aid eligibility purposes.

High school documentation not yet received

Kris enrolls in the bachelor's degree program at Maddon College. Kris completes his high school requirements early, but the high school does not formally issue the high school diploma until a later time. Maddon can award Kris Title IV funds if

Maddon obtains a statement signed by an official from Kris’s high school attesting that Kris has completed all of the required coursework and has successfully passed any required proficiency examinations for the high school diploma. The statement must include the date when the actual high school diploma will be issued. For more detail, see [34 CFR 600.2](#), DCL GEN 16-09 and <https://www2.ed.gov/policy/highered/reg/hearulemaking/2009/hsdiploma.html>.

When a student incorrectly states diploma status

When a student incorrectly states an eligible diploma status, for example, stating one year that they had a high school diploma, and in a subsequent year either notifying you that the previous submission was a mistake, or simply answering “no” to the high school diploma question, then the student was ineligible for all Title IV aid in the prior award year, and is ineligible for all Title IV aid going forward. Before removing all aid, you should verify their answer.

In this case, the student is responsible for any overpayment they received when ineligible, including aid received for completed award years. You (the school) must communicate to the student that they have the responsibility for repaying the overpayment(s). You may also be required to report the overpayment to NSLDS; for more details, see Volume 4, Chapter 3. You may refer the case to the Department for collection if the student does not repay the overpayment(s). See Volume 4, Chapter 3 for a sample report form.

Homeschooling

Though homeschooled students are not considered to have a high school diploma or equivalent, they are eligible to receive Title IV funds if their secondary school education was in a homeschool that state law treats as a home or private school.

Some states issue a secondary school completion credential to homeschoolers. If this is the case in the state where the student was homeschooled, he/she must obtain this credential to be eligible for Title IV funds if the state requires it. You may rely on a homeschooled student’s self-certification that they completed secondary school in a homeschool setting. The student can include in his/her homeschooling self-certification that he/she received this state credential.

An eligible *institution* is defined in part as one that admits as regular students only those who have a high school diploma or equivalent, are beyond the compulsory age of attendance for the school’s state, or are dually enrolled at the college and a secondary school. For students who finish homeschooling at a younger age, the Department considers them to be beyond the age of compulsory attendance if:

- your school’s state would not require them to obtain a secondary completion credential as provided under state law; or
- the student has completed a secondary school education in a homeschool setting that qualifies as an exemption from compulsory attendance under state law.

See also *Volume 2, Chapter 1*.

Homeschooled students and institutional eligibility

HEA Sec. 102(a)(b)(c)

Homeschooled students

HEA Sec. 484(d)(3), [34 CFR 668.32\(e\)\(4\)](#)

State regulations (for home-schooling and other purposes)

www2.ed.gov/admins/comm/choice/regprivschl/index.html

Ability-To-Benefit (ATB) Alternatives & Eligible Career Pathway programs (ECP)

Students may become eligible for Title IV aid through the ATB alternatives in one of two ways. If a student first enrolled in an eligible postsecondary program prior to July 1, 2012 (regardless of receipt of any Title IV aid), the student may enroll in any eligible program and can become eligible through one of the ATB alternatives. However, if a student first enrolled in an eligible postsecondary program on or after July 1, 2012, the student may only become eligible through one of the ATB alternatives if the student is enrolled in an “eligible career pathway program” (see below for more details about eligible career pathway programs). An ATB student need not be enrolled concurrently in both the eligible postsecondary program and the component for attaining a high school diploma or its recognized equivalent.

The ATB alternatives include:

- Passing an independently administered Department of Education approved ATB test (see chart at the end of this section).
- Completing at least six credit hours or 225 clock hours that are applicable toward a Title IV-eligible degree or certificate offered by the postsecondary institution (neither remedial nor developmental coursework count toward this requirement). The coursework must demonstrate that the student has the ability to benefit from the postsecondary program in which the student is enrolled or intends to enroll, but need not be applicable to the specific degree or program in which the student is enrolled.
- Completing a state process approved by the Secretary of Education. Note: To date, state processes have been approved by the Secretary for the states of Washington, Illinois, Iowa, Mississippi, and Wisconsin.

Eligible Career Pathway Programs. An eligible career pathway program is a program that combines rigorous and high-quality education, training, and other services that:

1. Align with the skill needs of industries in the economy of the state or regional economy involved;
2. Prepare an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeships registered under the Act of August 16, 1937 (commonly known as the “National Apprenticeship Act”; 50 Stat. 664, chapter 663; 29 U.S.C. 50 et seq.);
3. Include counseling to support an individual in achieving the individual’s education and career goals;
4. Include, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
5. Organize education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable;
6. Enable an individual to attain a high school diploma or its recognized equivalent, and at least one recognized postsecondary credential; and
7. Help an individual enter or advance within a specific occupation or occupational cluster.

You must make a determination on whether a program meets these criteria, and you are responsible for documenting that your career pathway program(s) meet each of the requirements described above. The Department does not require that you receive approvals or endorsements from a State or local workforce agency to fulfill these requirements, although that may be one way that you document your compliance.

You must maintain documentation that each eligible career pathway program that you use as a basis for determining a

student’s eligibility under the ATB alternatives meets the above requirements. This must include documentation that the program(s) in question include workforce preparation activities and training for a specific occupation or occupational cluster, and that the program is aligned with the skill needs of the U.S. state or regional economy in which your school is located.

Additional information regarding the requirements for eligible career pathway programs can be found in [Dear Colleague Letter GEN-16-09](#).

Eligibility of Other Students Without a High School Diploma (Grandfathered Students). As discussed in Dear Colleague Letter GEN-12-09, students who were enrolled in an eligible program of study prior to July 1, 2012 may continue to establish Title IV eligibility in any eligible program under one of the ATB alternatives by using the following grandfathering test:

Question 1: Did the student attend an eligible program at any Title IV institution prior to July 1, 2012? If yes, the student may use any of the ATB alternatives (as described above) to become eligible for Title IV funds. If no, continue to Question 2.

Question 2: Did the student, prior to July 1, 2012, officially register at a Title IV institution, and was the student scheduled to attend an eligible program? If yes, the student may use any of the ATB alternatives (as described above) to become eligible for Title IV, HEA student assistance. If no, the student may not use the ATB alternatives to become eligible for Title IV, HEA student assistance, unless the student is enrolled in an eligible career pathway program.

For a student who qualifies to use one of the ATB alternatives through enrollment in an eligible program prior to July 1, 2012, you must document that the student successfully completed one of the approved ATB alternatives described above. Such documentation could include documentation from NSLDS that shows a student’s prior receipt of Title IV funds, or a transcript or other receipt that demonstrates enrollment in an eligible program.

ATB & ECPP Eligibility timing

When a student becomes eligible through enrollment in an Eligible Career Pathway program or by completing “at least 6 credit hours or 225 clockhours that are applicable to a degree or certificate offered by your school,” as an ATB alternative, the student does not gain eligibility during the period in which he/she is completing those hours. The student only becomes eligible for Pell Grants and Campus-Based aid in payment periods following the period in which the hours were completed, and a school may only originate a Direct Loan for a period which follows the period in which the hours were completed.

Ceasing to be an ATB student

A student who gained Title IV eligibility under one of the ATB alternatives ceases to be an ATB student when they obtain a high school diploma or its recognized equivalent. At that point, the student is no longer subject to the restrictions on ATB students, including that the student be enrolled in an eligible career pathway program in order to be (potentially) Title IV-eligible.

ATB options & Eligible Career Pathway Programs

[34 CFR 668.32\(e\)](#)(2,3,5) Consolidated Appropriations Act of 2016 (Public Law 114-113)

[DCL GEN-16-09](#)

HEA Sec. 484(d)

Workforce Innovation and Opportunity Act (29 U.S.C. 3102(7))

ATB tests

[34 CFR Part 668 Subpart J](#) (Sections 141–156),

[Electronic Announcement June 24, 2015](#)

[Federal Register November 9, 2020](#)

Approved ATB Tests

Approved ATB Tests	Publishers & Passing Scores
Wonderlic Basic Skills Test (WBST) Verbal Forms VS-1 and VS-2, Quantitative Forms QS-1 and QS-2. This is a paper test.	Wonderlic, Inc., 400 Lakeview Parkway, Suite 200, Vernon Hills, IL 60061 Contact: Chris Young, 847-247-2544 Passing Scores: Verbal 200, Quantitative 210
Wonderlic Basic Skills Test (WBST) Verbal Forms VS-1 and VS-2, Quantitative Forms QS-1 and QS-2. This is an online version of the tests.	Wonderlic, Inc., 400 Lakeview Parkway, Suite 200, Vernon Hills, IL 60061 Contact: Chris Young, 847-247-2544 Passing Scores: Verbal 200, Quantitative 210
Spanish Wonderlic Basic Skills Test (Spanish WBST) Verbal Forms VS-1 and VS-2, Quantitative Forms QS-1 and QS-2. This is a paper test.	Wonderlic, Inc., 400 Lakeview Parkway, Suite 200, Vernon Hills, IL 60061 Contact: Chris Young, 847-247-2544 Passing Scores: Verbal 200, Quantitative 200
Spanish Wonderlic Basic Skills Test (Spanish WBST) Verbal Forms VS-1 and VS-2, Quantitative Forms QS-1 and QS-2. This is an online version of the tests.	Wonderlic, Inc., 400 Lakeview Parkway, Suite 200, Vernon Hills, IL 60061 Contact: Chris Young, 847-247-2544 Passing Scores: Verbal 200, Quantitative 200
Combined English Language Skills Assessment (CELSA), Forms 1 and 2.	Association of Classroom Teacher Testers (ACTT), 1187 Coast Village Road, Suite 1, 378 Montecito, CA 93108 Contact: Pablo Buckelew, 805-965-5704 Passing Scores: CELSA Form 1: 97, Form 2: 97.
ACCUPLACER Computer-adaptive tests and Companion ACCUPLACER Forms J & K: Reading, Writing, Arithmetic	The College Board, 250 Vesey Street, New York, NY 10281 Contact: The ACCUPLACER Program, 800-607-5223 Passing Scores: Reading 233, Writing 235, and Arithmetic 230.
Texas Success Initiative (TSI) Assessment Computer-adaptive tests and COMPANION TSI Forms T and V: Reading Placement Test, Writing Placement Test, Mathematics Placement Test	The College Board, 250 Vesey Street, New York, NY 10281 Contact: The TSI Assessment, 800-607-5223 Passing Scores: Reading Placement Test 336, Writing Placement Test 345, Mathematics Placement Test 326

To refer to ATB tests which were approved in the past, see the June 24, 2015 E-Announcement on FSA Partner Connect

Satisfactory Academic Progress (SAP)

To be eligible for Title IV funds, a student must make satisfactory academic progress, and your school must have a reasonable policy for monitoring that progress. The Department considers a satisfactory academic progress policy to be reasonable if it meets both the qualitative and quantitative criteria explained in this section.

Your SAP policy must be at least as strict (in terms of the qualitative and quantitative standards discussed below, not the frequency with which these are checked) as your SAP policy for students enrolled in the same program of study who are not receiving Title IV funds at your school, and it must apply equally to all students within categories, e.g., full-time, part-time, undergraduate, and graduate students. A school may create different SAP policies for different categories or groups of students, e.g. full-time vs. part-time, undergraduate vs. graduate students, and students enrolled in different academic programs.

You may use standard rounding rules on any SAP measurements for both qualitative and quantitative components (i.e. round up .5 and higher, round down if below .5). If you choose to round any SAP measurements, your policy for doing so must be included in your school's general SAP policy. A student is either making SAP for all Title IV programs, or is not. You cannot say a student is making SAP for Pell but not for Direct Loans.

Your policy(ies) must include an academic progress evaluation at the end of each payment period for students in programs lasting one year or less. For all other programs, the policy must include annual reviews which must correspond with the end of a payment period. For programs greater than one year, your policy may also call for progress reviews after each payment period. If you review at each payment period, you must review SAP after every term, (including any summer terms) the student was enrolled. You may have reasonable rules for students who initially enroll in specific courses but modify that enrollment within a limited time.

Grades and pace of completion

Your school's policy must specify that both the **quantitative (pace)** and **qualitative (grade-based)** standards are reviewed at each evaluation point, if required for that program (nonterm credit, subscription-based and clock-hour programs are now exempt from the quantitative/pace evaluation, see discussion of the quantitative standard below). Each component *may* include a payment period-based standard but are *required* to include a cumulative standard. You may review SAP via satisfactory progress checks more frequently, (for example, monthly), but the more frequent reviews are considered informal checks and cannot replace the review that is required to be conducted at the end of the payment period.

Your policy must specify the *qualitative standard* (grade point average or GPA) that a student must have at each evaluation or, if GPA is not an appropriate qualitative measure, a comparable measure against a norm. In addition, the HEA requires a specific qualitative review at the end of the student's second academic year. Students enrolled in a program of more than two academic years must have a GPA of at least a "C" or its equivalent or must have an academic standing consistent with your school's graduation requirements.

Having a standing consistent with the requirement for graduation means you could use an escalating GPA instead of a fixed one. For example, if your school uses a 4-point scale, it could require students to have a 2.0 average by graduation but allow their average to be lower earlier in their program. If your policy permits such a progression and a student falls below a C average, you must be able to document that her average is consistent with the academic standard required for graduation.

Remedial coursework **must** be included in the qualitative assessment of SAP. The courses need not be included in the student's GPA; however, your school must have some means of assessing a student's qualitative academic progress in remedial coursework. Similarly, you must have a means of assessing student progress in programs comprised entirely of pass/fail coursework.

Courses attempted on a pass/fail basis count as attempts for SAP purposes (see the guidance below on pace), but are not factored into a student's GPA for SAP purposes. When there are just a few pass/fail courses in the overall program, such courses do not have to be included in the qualitative/grades SAP component as long as they are counted in the quantitative/pace component. However, a program comprised primarily or 100% of pass/fail coursework must be counted in both qualitative and quantitative components.

Your SAP policy must also specify the quantitative standard (pace) at which students must progress through their program to ensure that they will graduate within the maximum timeframe (see below for full definition of maximum

timeframe), and each satisfactory progress check must measure this. Nonterm credit, subscription-based and clock-hour programs are now exempt from the quantitative/pace evaluation. For these exempt programs, your school may, at its option, include them in an SAP calculation for the quantitative component of SAP (see the [9/2/20 final regulation](#)).

For credit-hour programs using standard or nonstandard terms that are not subscription-based programs, you calculate the pace at which a student is progressing by dividing the total number of hours the student has successfully completed by the total number they have attempted, or by determining the number of hours that the student should have completed by the evaluation point in order to complete the program within the maximum timeframe. You may include, but aren't required to include, remedial courses when making the assessment of the quantitative component of SAP.

As noted above, subscription-based programs are exempt from including a quantitative/pace component as part of SAP, however, a student in a subscription-based program is not eligible to receive a subsequent disbursement until the credit hours (or equivalent) associated with all prior payment periods have been completed. Students are allowed one additional subscription period to catch up without losing eligibility for Title IV aid. For more detail on subscription-based programs, see *Volume 3*.

You may exclude from the SAP quantitative/pace calculations any credits a student attempted, but could not complete due to the COVID-19 national emergency. It is not necessary for a student to have filed a SAP appeal for a school to exercise this flexibility, but you must have reasonably determined that the student's failure to complete those credits was the result of a COVID-19 related circumstance. Allowable circumstances include, but are not limited to: illness of the student or family member, need to become a caregiver or first responder, economic hardship, added work hours, loss of childcare, inability to continue with classes via distance education, and inability to access wi-fi due to closed facilities. Please note that this flexibility is applicable for SAP assessments made through the end of the payment period that includes the last date that the national emergency is in effect.

Checking a student's pace of completion allows for variations of enrollment status since you look at the percentage of classes successfully completed rather than a time-frame in which courses are taken. Also, you can use a graduated completion percentage for each year of a program. For instance, your policy can permit students to complete a lower percentage of their classes in the first academic year but require them to complete an increasing percentage in subsequent years so that they finish their program in time. A student becomes ineligible (via the maximum timeframe element) at the point at which it becomes mathematically impossible for them to complete the program within 150% of its length if it is an undergraduate program, or within the maximum timeframe established by the school if it is a graduate program (for more on maximum timeframe, see the maximum timeframe definition below). In this situation, an appeal would be possible if your school allows appeals.

Your policy must explain how GPA and pace of completion are affected by incomplete courses, withdrawals, and repetitions, and by transfer credits from other schools. Generally, all periods of the student's enrollment count when assessing progress, even periods in which the student did not receive Title IV funds. However, only transfer credits that count toward the student's current program must be counted (as both attempted and completed hours; credits not counted toward the student's program may also be counted at your school's discretion, as described in your SAP policy). Your policy may permit that for students who change majors, credits and grades that do not count toward the new major will not be included in the satisfactory progress determination. You may limit how many times a student can change majors, for SAP purposes.

Your SAP policy cannot exclude from the satisfactory progress check courses in which a student remained past the add/drop period and earned a grade of "W" (or its equivalent), nor can it exclude a specific type of hours attempted, such as those taken during a summer session. A review of SAP is not complete until both the qualitative and quantitative measures have been reviewed. If a satisfactory progress check shows that a student does not have the required GPA or is not maintaining the required pace, she becomes ineligible for Title IV funds unless your school reviews SAP after every payment period or permits SAP appeals, as explained below.

You may monitor SAP throughout the payment period, for example, at the end of each month, but an official review (i.e., for Title IV eligibility purposes) may only occur at the end of a payment period. A monthly evaluation that contains the end of a payment period (such as hour 450) cannot count as the official evaluation for the entire payment period. After an official evaluation, a student not meeting SAP standards must be placed on termination (i.e., immediate loss of Title IV eligibility), warning, or probation (if the student submits a successful appeal) status. You may not put someone on warning or probation for less than a payment period.

SAP matching progress and published length of program

A school's attendance policy may be more strict than the quantitative (pace) standard for SAP. However, if the standards do not match, a student may continue to meet SAP progress requirements for one standard and not for the other, which can result in the student being charged over-contract hours due to failing to meet the stricter standard. If, in a program to which these standards apply, a substantial majority of students graduate after the published length of the program (while retaining Title IV eligibility & incurring overtime charges), ED would expect the school to revise the published length of the program.

Satisfactory progress definitions

Appeal—A process by which a student who is not meeting SAP standards petitions the school for reconsideration of his eligibility for Title IV funds.

Financial aid probation—A status a school assigns to a student who is failing to make satisfactory academic progress and who successfully appeals. Eligibility for aid may be reinstated for one payment period.

Financial aid warning—A status a school assigns to a student who is failing to make satisfactory academic progress. The school reinstates eligibility for aid for one payment period and may do so without a student appeal. This status may only be used by schools that check SAP at the end of each payment period and only for students who were making SAP in the prior payment period for which they were enrolled or who were in the first payment period of their program.

Maximum timeframe:

- For an undergraduate program measured in credit hours, a period no longer than 150 percent of the published length of the program, as measured in credit hours, or expressed in calendar time. If your school chooses to use calendar time to measure maximum timeframe, you evaluate a student's pace by determining the number of hours that the student should have completed at the evaluation point in order to complete the program within the maximum timeframe. Measuring credits completed over calendar time may be considered a stricter method of evaluation, as it holds a student to the same pace regardless of the student's enrollment status in any given payment period. Note that evaluating SAP progress via calendar time for credit hour programs is optional; you may still evaluate progress for these programs by measuring credit hours.
- For an undergraduate program measured in clock hours, a period no longer than 150 percent of the published length of the program as measured by the cumulative number of clock hours the student is required to complete and expressed in calendar time. (Note that a student in a clock hour program cannot receive aid for hours beyond those in the program; the maximum timeframe applies to the amount of calendar time the student takes to complete those hours.)
- For a graduate program, a period the school defines that is based on the length of the program. Credit hour graduate programs may also measure maximum timeframes either in credit hours or calendar time.

At each official SAP evaluation point, (at the end of a payment period) you must evaluate whether it is possible for students to complete their program within the maximum timeframe. Students fail the maximum timeframe measure at the point at which it is determined that it is not possible for them to complete their program within the maximum timeframe, not at the point they actually reach the maximum timeframe.

SAP new/conflicting information requirements

SAP calculations are to be performed at established intervals which must coincide with the end of a payment period as prescribed in 34 CFR 668.34(a) (3). You are not required to recheck SAP and/or recalculate as the result of grade changes that occur between formal SAP evaluations.

However, a school may have a policy of recalculating to account for subsequent grade changes. If your school has a policy to recalculate, you may make disbursements of Title IV aid for which the student becomes eligible as a result of the grade changes. However, there are limitations on when a school can make a disbursement in these circumstances:

- For Pell and TEACH Grants, you may only make a disbursement based on a grade change during the payment period immediately following the SAP evaluation that was affected by the change.
- For all other types of Title IV aid, you may only make a disbursement based on a grade change during the academic

year in which the SAP evaluation takes place, or, if the evaluation takes place at the end of an academic year, during the academic year following that SAP evaluation.

For example, consider a student who was deemed ineligible for Title IV aid in the spring term due to failing an SAP evaluation at the end of the fall. If the school changes the student's grades during the spring term, it could pay the student Pell or TEACH Grant funds for the spring. However, if the school decided to change the student's grades after the spring term ended, it could not disburse Pell or TEACH Grant funds to the student for the spring term.

Schools should **not** alter aid already disbursed to students based on SAP evaluations that were accurate at the time they were performed. For example, consider a student who was deemed eligible for Title IV aid in the spring term after passing a SAP evaluation that included incomplete classes, but the school changes those incomplete grades to failing grades during the spring term. Had the student failed those courses prior to the SAP evaluation, he or she would have failed the evaluation and been ineligible for aid during the spring term. However, in this situation, the school should not return the student's Title IV aid for the spring term because the student was eligible on the basis of a SAP evaluation that was accurate at the time it was performed.

Whether or not your school has a policy of rechecking SAP between evaluation points, any grade changes must be accounted for in the next scheduled SAP evaluation. Although schools have the option of recalculating SAP due to grade changes, these changes should be a rare occurrence. If changes to student eligibility on the basis of grade changes occur on a regular, consistent basis, FSA may have compliance concerns.

Financial aid warning

Only schools that check satisfactory progress at the end of each payment period may place students on financial aid warning as a consequence of not making satisfactory progress. A school may use this status without appeal or any other action by the student. Warning status lasts for one payment period only, during which the student may continue to receive Title IV funds. Students who fail to make satisfactory progress after the warning period lose their aid eligibility unless they successfully appeal and are placed on probation. Schools do not need to use the warning status; they can instead require students to immediately appeal to be placed on probation.

Appeals, financial aid probation, and academic plans

All schools may use financial aid probation as part of their satisfactory progress policy. When a student loses FSA eligibility because he failed to make satisfactory progress, if the school permits appeals, he may appeal that result on the basis of: his injury or illness, the death of a relative, or other special circumstances. His appeal must explain why he failed to make satisfactory progress and what has changed in his situation that will allow him to make satisfactory progress at the next evaluation.

If you determine, based on the appeal, that the student should be able to meet the SAP standards by the end of the subsequent payment period, you may place him on probation without an academic plan. You must review the student's progress at the end of that one payment period, as probation status is for one payment period only. If you determine, based on the appeal, that the student will require more than one payment period to meet progress standards, you may place him on probation and develop an academic plan for the student. You must review the student's progress at the end of one payment period as is required of a student on probation status, to determine if the student is meeting the requirements of the academic plan.

If the student is meeting the requirements of the academic plan (or the universally applicable SAP requirements, outside of any individualized academic reinstatement plan), the student is eligible to receive Title IV aid as long as the student continues to meet those requirements and is reviewed according to the requirements specified in the plan.

Your school determines the process and documentation required for an appeal. It may decide to require more extensive information on an initial appeal and some type of an update statement on a subsequent appeal. The regulations do not specify what must be included in an academic plan. The school and the student must develop a plan that ensures that the student is able to meet the school's satisfactory progress standards by a specific time, though an academic plan could instead take the student to successful program completion. Students must also appeal to change their plan. They must explain what has happened to make the change necessary and how they will be able to make academic progress.

Reestablishing aid eligibility

Your policy, even if it does not permit appeals, must explain how students who are not making satisfactory academic progress can restore their eligibility for Title IV funds. Other than when a student is placed on financial aid warning or probation or has agreed to an academic plan as outlined above, he can regain eligibility only by taking action that brings him into compliance with your school’s satisfactory progress standards. The requirement that a student complete a number of credits or enroll for a number of academic periods without receiving Title IV funds, or that he interrupts his attendance for one or more academic periods, may be part of your academic progress policy. However, paying for one’s classes or sitting out for a term does not affect a student’s academic progress status, so neither is sufficient to reestablish aid eligibility.

Grades and SAP: Academic amnesty/renewal

Some schools have academic amnesty/renewal procedures through which a student can apply to have credits attempted and grades earned in previous semesters excluded from the calculation of the student’s grade point average. The FSA program regulations make no provision for the concept of academic amnesty or academic renewal. Therefore, a school must always include courses applicable to a student’s major (whenever taken) in evaluating a student’s satisfactory academic progress (both quantitative and qualitative components) except as permitted under their SAP policy for handling repeat coursework. However, a student may be able to appeal loss of eligibility due to special circumstances.

Completed program, no degree

A student who completes the academic requirements for a program but does not yet have the degree or certificate is not eligible for further additional Title IV funds for that program.

SAP for test-based credits

Some schools have developed tests in accord with their academic standards, such as language proficiency tests, which students can take and receive course credit. If such credits count toward the student’s program, the grades for those credits count in the student’s GPA for all FSA purposes. Such credits must be counted towards SAP for quantitative/pace purposes, and may, according to the school’s written policy, be counted towards the student’s qualitative/grades SAP measurement.

Satisfactory Academic Progress

HEA Sec. 484(c), [34 CFR 668.16\(e\)](#), [34 CFR 668.32\(f\)](#), [34 CFR 668.34](#)

Q&A: www2.ed.gov/policy/highered/reg/hearulemaking/2009/sap.html

Satisfactory Academic Progress Examples: Four-Year Programs

Four-year credit-hour program with appeal
Students in a bachelor’s degree program at National College must complete 120 credits and may attempt up to 180 credits (120 x 150%). National reviews a student’s academic progress once per year and has a pace of completion of 2/3 or 66.67% of the classes that students attempt; it requires a cumulative GPA of 1.50 after the first year, 1.75 after the second year, and 2.0 after the third year and beyond.

4-year credit-hour program with warning and appeal
Krieger University checks SAP every quarter, which permits it to use financial aid warnings. Students must complete 144 credit hours to receive a BA or BS degree, and they may attempt up to 216 credit hours to complete a program. Students must complete at least half of the credits they attempt in their first year and 75% of their credits in each year after that. They must have no less than a 2.0 GPA at

all times.

In his first semester, Danny fails one course and withdraws (late in the term) from one of his five courses (15 credits). He takes four courses in his second semester and again fails one and withdraws from one. Though his GPA is 1.71, he isn't making SAP by the end of the first year because he completed only 15 credits out of the 27 he attempted, and two-thirds (2/3) of 27 is 18. Danny applies for an appeal, but because his only reason for not making SAP is that he wasn't able to concentrate on college after being in high school, and because he doesn't offer evidence showing what has changed, the aid administrator at National denies his appeal, and he is ineligible for aid in his second year.

Even if Danny had a more convincing reason for failing at SAP, such as being injured and being rendered unable to participate effectively in his normal activities, the administrator might still have denied his appeal because she saw little improvement or variation in Danny's pace of completion and did not determine that he would likely be making SAP a year later. If Danny's academic performance improves by the end of his second year so that he is meeting the SAP criteria, he can again receive Title IV funds.

Gina finishes her first year at Krieger with a 2.25 GPA and completes all of the credits that she attempts, so she is making SAP. After the first quarter in her second year, she again completes all of her classes but poor grades leave her with a 1.94 GPA. The aid administrator places her on financial aid warning for one quarter and informs her that she is not meeting the SAP standards. Gina does poorly in the next quarter as well, and her GPA drops to 1.85. The aid administrator informs her that she can't continue on warning status and needs to submit an appeal explaining why she is failing to make SAP and why she thinks that will change and allow her to again make SAP.

Gina brings the administrator an obituary showing that her mother died recently, which required that she help with family affairs and caused her to lose her focus at school. She asserts that is over now. The administrator places her on probation and suggests that she might take fewer courses. But Gina enrolls full time and again receives poor grades, causing her GPA to drop to 1.80. The administrator informs Gina that she has become ineligible for Title IV funds but that she can become eligible again if she raises her GPA to 2.0 or that she can submit another appeal (the latter appeal must be based on a reason different from the first appeal) and this time request to be placed on an academic plan.

Satisfactory Academic Progress Examples: One-Year Programs

1-year credit-hour program with financial aid warning Carver University has a program that a full-time student can complete in 24 semester hours. Because this is a one-year program, Carver must check SAP every payment period. Their policy is that students must complete the program by the time they have attempted 36 (150% of 24) hours, and the pace of completion is 2/3 or 66.67%. They require a 2.0 GPA at all times.

Suzie plans to take two classes (eight hours) each semester. In the first term, she fails one class and gets a B in the other. Her GPA is 1.5 and her pace of completion is 50%, so Carver automatically places her on financial aid warning and informs her of this. In her second semester, Suzie gets a C (in the class she failed in the first semester) and an A, raising her

academic performance until late in (or the end of) the program, Fowler decides not to use warnings. Instead, it requires students to submit an appeal when they are not meeting SAP standards.

After the first four months, Anthony's GPA is 3.0, but he completes only 250 of the 300 clock hours that were required for the payment period. Fowler informs him that he must submit an appeal to continue to receive Title IV funds. Anthony tells the administrator that he was diagnosed with depression, which prevents him from doing as much as he'd like. He provides a note from his psychiatrist and affirms that he is doing better since he has received regular treatment. The administrator grants his appeal and puts him on financial aid probation since she determines that Anthony can finish the

GPA to 2.25 (Carver counts all grades for retaken classes), and she has completed 75% of her classes, so she restores her aid eligibility.

Clock-hour program with appeal Fowler

Community College has a 900-clock-hour program that normally takes eight months to complete. Fowler allows a maximum timeframe of 12 months to complete the program, and students must complete at least 300 clock hours out of the 450 clock hours of each payment period (four months) and maintain a 2.0 GPA. Because the program is so short and financial aid warnings would delay a rigorous review of students'

program in the remainder of the year. She drafts a plan that allows him some flexibility in his pace of completion and that requires him to check with her once a month to inform her of his progress in his classes.

After four more months, Anthony's GPA is 3.3, and he has completed 580 hours out of the 600 required under Fowler's published SAP policy, which would normally make him ineligible for Title IV funds. But because he is progressing according to his personal SAP plan and is predicted to complete the program within the maximum timeframe, he may continue to receive aid.

SAP Practices FAQs

Q. If a student fails SAP at the end of a payment period and becomes ineligible for aid in the next payment period, can the school still provide a late disbursement of aid for eligible coursework associated with the previous payment period?

A. Yes, if the student meets all of the late disbursement requirements (and was in all other ways eligible at the time). SAP is forward looking and impacts student eligibility in subsequent payment periods.

Q. After my school makes an SAP evaluation, can a student be placed on warning or probation status (if the appeal is successful) for a period that is shorter than a payment period?

A. No, the warning or probation period must last for at least one payment period.

Q. When determining SAP, is it permissible to only include coursework applicable to the student's program in the qualitative calculation, while including all coursework in the quantitative calculation?

A. Normally, coursework assessed must be the same for both qualitative and quantitative measures.

However, in the case of a transfer student, all of a student's credits accepted towards the new program must be counted in the quantitative measurement, but transfer credits are optional in the qualitative measurement. You are not required, for instance, to factor in grades from other institutions into students' GPA at your school.

Q. May we have a policy in our larger SAP policy that when a student changes majors or program, only the credits still applicable to the student's new major count towards SAP?

A. Yes. The treatment of a student who changes majors is determined by the school. You must specify in your SAP policy whether or not you will include all coursework acceptable towards the degree in which the student is now enrolled.

Enrollment Status

A student must be enrolled at least half time to receive aid from the Direct Subsidized/Unsubsidized and Direct PLUS Loan programs. The Pell, TEACH Grant, and Campus-Based Programs don't require half-time enrollment, with three exceptions:

- students must be enrolled at least half-time in the payment period(s) for which the student receives the additional Pell Grant funds in excess of 100 percent of the student's Pell Grant Scheduled Award;
- students must be enrolled at least half-time in a teaching credential program to be eligible for Federal Work Study (FWS).
- students must be enrolled at least half-time in a post-baccalaureate program for teacher education; and

Enrollment status does affect the amount of Pell a student receives; see *Volume 3, Chapter 3*. Students in nonterm programs are always considered full-time for Pell purposes.

To be enrolled half time, a student must be taking at least half of the course load of a full-time student. Your school defines a full-time workload, but it must meet the minimum standards in the FSA regulations. The definition of full time for FSA purposes can differ from that used for other purposes at your school, such as the definition used by the registrar's office. Your definition of a full-time workload for a program must be used for all students in that program and must be the same for all FSA-related purposes, including loan deferments. You can't accommodate a student with a learning disability or other handicap by allowing her a full-time enrollment status lower (for Title IV financial aid purposes) than the minimum standard (see the section earlier in the chapter on students with intellectual disabilities). Note that for students in Comprehensive Transition and Postsecondary (CTP) programs, the scope of activity that may be counted for full-time status is broader than it is for students in traditional programs.

A school may choose to define half time as half of the minimum fulltime standard established in the regulations even if this is less than half the full-time standard established by the school. For example, if a school sets 14 semester hours as full time, it could use 6 semester hours (one-half of the regulatory full-time minimum of 12) as half time instead of 7.

Minimum standards for full-time enrollment

A student's workload may include any combination of courses, work, research, or special studies that your school considers sufficient to classify them as full time. This includes, for a term-based program that is not subscription-based, no more than one repetition of a previously passed course that is not due to the student failing other coursework. The regulations specify a minimum standard for undergraduate students but not for graduate students. For undergraduates, full-time status must be at least:

- 12 semester hours or 12 quarter hours per academic term in an educational program using a semester, trimester, or quarter system;
- 24 semester hours or 36 quarter hours per academic year for an educational program using credit hours but not using terms, or the prorated equivalent for a program of less than one academic year;
- 24 clock hours per week for an educational program using clockhours;
- A series of courses or seminars equaling 12 semester or quarter-hours over a maximum of 18 weeks;
- For a program that measures credit hours and uses nonstandard terms, the number of weeks of instruction in the term divided by the number of weeks of instruction in the academic year, multiplied by the number of credit hours in the program's academic year;
- The work portion of a cooperative education program in which the amount of work performed is equivalent to the academic workload of a full-time student; or
- For correspondence coursework, a courseload commensurate with the full-time definitions listed here, and at least half of that load must be non-correspondence coursework that meets half of the school's requirement for full-time students.
- For subscription-based programs, a full-time course load commensurate with the full-time definitions for standard and nonstandard term programs listed here. For a full discussion of subscription-based programs and terms, see *Volume 3*.

Note that the definition of full-time student, upon which all enrollment statuses are based, has changed. Please refer to the revised [34 CFR 668.2\(b\)](#). The regulatory definitions of credit-hour, clock-hour and academic year have also been updated. For more details, see *Volume 2, Chapter 2* (clock hour and credit hour), *Volume 3, Chapter 1* (academic year), and the September 2, 2020 *Distance Education and Innovation* regulatory package ([34 CFR 600.2](#)).

Your school must have a written policy stating what enrollment status the work portion of a co-op program is equivalent to. If it equals or exceeds a full-time academic load, the co-op student is considered full time regardless of how many credits are earned for the co-op work. A student taking only correspondence courses is never considered to be enrolled more than half time. See *Volume 3* for more on Pell and enrollment status and correspondence courses. If a student is enrolled in courses that do not count toward his degree, certificate, or other recognized credential, they cannot be used to determine enrollment status unless they are eligible remedial courses.

This means you cannot award the student aid for classes that do not count toward his degree, certificate, or other recognized credential. Also, federal student aid can be awarded only for learning that results from instruction provided or

overseen by the school. It cannot be awarded for any portion of a program based on study or life experience prior to enrollment in the program, or based on tests of learning that are not associated with educational activities overseen by the school.

Eligibility and enrollment status for retaking coursework

The regulatory definition for full-time students allows a student, in a term-based (not subscription-based or nonterm) program only, to retake any previously passed course a maximum of once per course. For this purpose, passed means any grade higher than an “F,” regardless of any school or program policy requiring a higher qualitative grade or measure to have been considered to have passed the course. This retaken course may be included in the student’s enrollment status, and would count toward the student’s eligibility for Title IV aid.

SAP regulations allow a student to receive Title IV funds for retaking a course he or she failed, and if a student withdraws before completing the course that he or she is being paid Title IV funds for retaking, that is not counted as his or her one allowed retake for that course. However, if a student passed a class once, then is repaid for retaking it, and fails the second time, that failure counts as their paid retake, and the student may not be paid for retaking the class a third time.

If your school has a policy that requires students to retake all of the coursework for a term in which a student fails a course, only the first retake of any previously passed course is eligible for Title IV aid (see the preamble to the October 15, 2015 Program Integrity regulation; page 67127). If a student withdraws from all Title IV eligible courses in the payment period or period of enrollment and continues to attend only the course(s) that they are completing or repeating for which they may not receive Title IV aid during that period, the student is a withdrawal for Title IV purposes. This is because a student is considered to be attending a Title IV eligible program only if he or she is attending one or more courses in that program for which the student is receiving Title IV funds. For more details on eligibility for retaking coursework, see [34 CFR 668.2\(b\)](#).

Counting non-credit or reduced-credit remedial work in enrollment status

A student can receive aid for a limited amount of remedial coursework that is included as part of a regular program. As long as the student qualifies for aid for remedial courses, you must include the remedial courses in the student’s enrollment status.

Some schools give no credit or reduced credit for remedial classes. To determine enrollment status, credit hours for the remedial class should be the same as for the comparable full-credit class. If you’re using credit hours, you can compare the number of classroom and homework hours of study that the remedial course requires with the hours required for similar courses offered for full credit. Clock-hour schools should use the number of classroom hours attended in the remedial program. For more details, see [34 CFR 668.20](#).

Enrollment status for students with intellectual disabilities

Because a comprehensive transition and postsecondary (CTP) program for students with intellectual disabilities can include work for which the school awards no credit, such as audited courses, the school must develop equivalencies in credit hours for such work, just as it must do with non-credit remedial coursework. This will allow the school to determine the enrollment status for students in these programs.

Full-time student definition

[34 CFR 668.2\(b\)](#)

Half-time enrollment

Students Convicted of Possession or Sale of Drugs

In December 2020, the FAFSA Simplification Act was enacted into law as part of the Consolidated Appropriations Act of 2021. The FAFSA Simplification Act amended Section 484 of the Higher Education Act of 1965 (HEA), making several important changes to student eligibility criteria. One of these is the elimination of the prohibition on receiving Title IV aid for students with drug-related convictions.

For the 2022-2023 award year, the Selective Service and drug conviction questions will remain on the FAFSA. However, having a drug conviction while receiving Title IV aid will no longer impact a student's Title IV aid eligibility, and a student who has a drug conviction may be eligible to receive Title IV aid if they meet all other eligibility criteria. For the 2022-23 award year, you will continue to see comment codes 53, 54, 56, and/or 58, but the Department will include language in the comment codes indicating that no further action needs to be taken by the student or school, and such students are eligible for Title IV aid if they meet all other eligibility requirements. Please see Dear Colleague Letter GEN-21-04 for more information about the implementation of these changes.

Drug convictions

HEA Section 484, [DCL GEN-21-04](#)

[Federal Register Notice June 17, 2021](#)

Incarcerated Students

No student who is incarcerated in a Federal or State penal institution may be eligible to receive Pell Grant funds, however, such students may still be potentially eligible for FSEOG and FWS. Halfway houses, periods of home detention, and/or serving only weekends are not considered incarceration for Title IV eligibility purposes.

The FAFSA Simplification Act (part of the Consolidated Appropriations Act, 2021) made changes to the HEA that will restore Pell eligibility for certain individuals incarcerated in State and Federal penal institutions as of July 1, 2023. This change has not yet been implemented, and the Department will provide further guidance at a later date.

A student is considered to be incarcerated if he or she is serving a criminal sentence in a federal, state, or local penitentiary, prison, jail, reformatory, work farm, or similar correctional institution (whether it is operated by the government or a contractor).

An incarcerated student is still potentially eligible for Pell, FSEOGs, and FWS, but not Direct Loans, if he or she is incarcerated in a juvenile justice facility, a local or county jail, or a local or county penitentiary or correctional facility, regardless of which governmental entity operates or has jurisdiction over the facility. However, a student in such an institution is still considered incarcerated for purposes of calculating cost of attendance (COA) under section 472 of the HEA when determining eligibility for and the amount of the Pell Grant (See *Volume 3, Chapter 2* for more on COA).

You may accept the student's written self-certification that he is no longer incarcerated (be sure to explain to the student the differences in what is considered incarcerated status, per the above). See *Chapter 6* for more information on this and on sex offenders who were incarcerated but are now subject to an involuntary civil commitment.

Incarcerated students

HEA Sec. 401(b)(6) and 484(b)(5), 34 CFR 600.2 and 668.32(c)(2), DCL GEN-14-21 Juvenile Justice Facility: A public or private residential facility that is operated primarily for the care and rehabilitation of youth who, under state juvenile justice laws, are accused of committing a delinquent act, have been adjudicated delinquent, or are determined to be in need of supervision.

Conflicting Information

In addition to reviewing data provided by the Department’s application system and NSLDS (as discussed in the rest of this volume), your school must have an internal system to share information relevant to the student’s eligibility, such as his or her academic standing. The FSA program regulations require a school to develop an adequate system to ensure the consistency of any data related to a student’s application or eligibility for Federal Student Aid regardless of the source of that data.

The best way to avoid generating conflicting information is to encourage those filing FAFSAs to use the IRS Data Retrieval Tool (DRT); for those items which can be transferred.

If your school has conflicting information for a student or you have any reason to believe his application is incorrect, you **must** resolve such discrepancies before disbursing Title IV funds. If you discover a discrepancy after disbursing Title IV funds, you **must** reconcile the conflicting information and require the student to repay any aid for which he wasn’t eligible, unless he is no longer enrolled for the award year and will not re-enroll. Your school is responsible for reconciling all inconsistencies that it receives with one exception: if the student dies during the award year, you aren’t required to resolve conflicting information.

In addition to efforts your school undertakes to identify and eliminate conflicting information, there is one additional type of potential conflicting information which will be identified automatically by the CPS. On 2022-23 ISIRs, when a potential conflict in parent or student data is detected, the CPS will issue a “400” or “401” code. When a 400 or 401 code is issued, you will need to determine if the code represents conflicting information and, if so, resolve the conflict and repackage any affected 2022-23 aid.

If you are unable to resolve the conflicting information, you must consider the student to be in overaward status for any need-based aid (i.e., Title IV grants and Direct Subsidized Loans) that was disbursed. FWS money does not need to be repaid, but you must immediately cease paying any further unearned FWS funds.

For more information on conflicting information, please refer to the *Application and Verification Guide and Volume 2*.

Resolving 400 & 401 SAR codes

July 31, 2019 E-Announcement
[2022-23 SAR Comment Code Guide](#)

Conflicting information

[34 CFR 668.16\(b\)\(3\) and \(f\)](#)

Change in Eligibility Status

A student's eligibility status can change during the award year, which almost always affects whether he can be paid. The special rules for changes in satisfactory academic progress status were discussed in the SAP section. For more details on Pell Grant status changes within and between terms, see *Volume 3, Chapter 3*.

Gaining eligibility

A student who *gains eligibility* is one who was previously ineligible for some reason. In general, a student who gains eligibility may receive Pell Grant, TEACH Grant, and Campus-Based funds for the entire payment period and Direct Loan funds for the period of enrollment in which he or she becomes eligible.

A student is eligible for Pell Grant, TEACH Grant, and Campus-Based aid for the entire award year, not just the payment period, in which he or she becomes eligible by meeting the requirements for citizenship (including becoming an eligible noncitizen), having a valid Social Security number, or being registered for Selective Service.

When a student regains Title IV eligibility after a loan default is resolved, the borrower regains Title IV grant eligibility beginning with the payment period in which the default was resolved and regains Direct Loan eligibility beginning with the period of enrollment in which the default was resolved.

To illustrate how students can gain eligibility, we can look at two hypothetical students, Roy and Leon. Roy enrolls in a one-year certificate program at Carver University. Carver won't officially admit Roy before he provides an academic transcript from his previous school, but it lets him start classes in the fall. Carver receives Roy's transcript after he's attended for a month and officially admits him. He's still in his first payment period when admitted, so he can receive Pell and Campus-Based funds for his entire period of enrollment. The school can also use the program length of one year as the period of enrollment for which Roy can receive a loan.

Leon is finishing his senior year in high school; his classes end June 4. He decides to start classes in the winter at Carver on January 11. The second payment period begins on May 17. Leon isn't eligible for aid when he first starts classes at Carver. However, when he becomes eligible after June 4, Carver can disburse Pell and Campus-Based funds to Leon retroactively for the current payment period that started on May 17 (but not for the payment period that started in January) and a Direct Loan for the current period of enrollment, which does include the payment period that began in January.

Losing eligibility

A student cannot receive any federal student aid after losing eligibility for it unless he or she qualifies for a late disbursement.

To illustrate the rule on losing eligibility, we'll look at a student named Steve. Steve is a student at Waveland University. At the end of September, after the start of the fall term, he defaults on a Direct Loan. Waveland gave Steve his first Direct Subsidized loan disbursement at the beginning of the semester in September and was going to disburse a Direct Unsub Loan to him in October.

Now Waveland can't disburse the Direct Unsubsidized Loan, since the first disbursement was scheduled after he lost eligibility. Steve doesn't have to pay back the first disbursement of his Direct Loan immediately (though he will have to pay it back once he enters repayment), and he can't receive additional Title IV funds until he makes satisfactory repayment arrangements to repay his defaulted loan.

Religious Order Student Eligibility

Effective July 21, 2021, previous regulations (see below), which considered students attending religious orders to have no need for Title IV aid, have been eliminated. Such students may now be considered to have financial need, in accordance with Part F of Title IV of the HEA, and are eligible to receive Pell Grant, Direct Loan, FWS, and FSEOG funds, if they meet all other student and program-specific eligibility criteria. This change is discussed more fully in chapter 6 of this Volume, where we discuss program-specific eligibility criteria.

Pell: 34 CFR 690.75 (d) eliminated
Direct Loans: 34 CFR 685.200(a)(2)(ii) eliminated
Campus-Based Programs: 34 CFR 675.9(c) and 34 CFR 676.9(c) eliminated

Selective Service

On December 27, 2020, the FAFSA Simplification Act was enacted into law as part of the Consolidated Appropriations Act, 2021. That law amended Section 484 of the HEA to remove the requirement for male students to register with the Selective Service before the age of 26 to be eligible for Title IV aid. Therefore, failing to register with the Selective Service will no longer impact a student's Title IV aid eligibility.

During the 2022-2023 award year, the Selective Service questions will remain on the FAFSA and schools will continue to see Comment Codes 30, 33, and 57 for Selective Service issues. Although these Comment Codes will still appear, the Department will include language in the Comment Codes stating that no further action is necessary on the part of the student or institution. You must award and disburse aid to these students if they meet all other eligibility criteria.

For additional details about this change and its implementation, see [Dear Colleague Letter GEN-21-04](#) on the Knowledge Center.

Defense of Marriage Act

DCL-GEN-13-25, DCL-GEN-14-14

For purposes of Title IV aid, the Department considers any legal marriage which was recognized by the jurisdiction in which it was performed as recognized without regard to whether the marriage is between persons of the same or opposite sex, and without regard to where the couple resides.

This has implications for dependency status and will impact how applicants fill out the FAFSA. For more details, see the *Application and Verification Guide, Chapter 2*.